

REMARKS

Entry of this Amendment, reconsideration of all grounds of rejection, and allowance of all the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-11, as shown above, remain pending herein. Claim 12 has been added, support for which is found in the specification at least at page 4, lines 26-29.

Claims 1 to 6, 8 10 and 11 stand rejected under 35 U.S.C. §102(a) in view of Klakow ("Selecting Articles from the Language Model Training Corpus" hereafter "Klakow"). This ground of rejection is respectfully traversed. Applicants reiterate that a certified English translation of the priority document shall be sent via Supplemental Amendment.

In addition, claim 1 has been amended to recite in part that:

a **final text corpus is obtained from iterations of reductions of the first text corpus according to**
predefined criterion, and in that the values of the language
model are generated on the basis of the **final** text corpus is
used.

Applicants respectfully submit that the specification at least at page 4, line 31 to page 5, line 2, provides support for the above change. It is respectfully submitted that instant claim 1 patentably distinguishes from Klakow at least because of the above recitation. Applicants respectfully submit that all of the claims dependent from claim 1 are believed to be allowable at least for their dependency from claim 1. Also, claim 11 is

believed to be patentable in view of Klakow, as the acoustic model is not disclosed by the reference as recited by base claim 8, from which claim 11 is depends.

Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 7 and 9 stand rejected under 35 U.S.C. §102(e) as allegedly anticipated by Ramaswamy et al. (U.S. 6,188,976, hereafter “Ramaswamy”). Applicants respectfully traverse this ground of rejection. It is respectfully submitted that Ramaswamy fails to disclose or suggest all of the elements recited by the Applicants, such as:

a second text corpus that is iteratively extended until a
predefined criterion is met and in that the values of the
language model are generated while the second text corpus
from the last iteration is used.

Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 1, 2, 5/1, 5/2, 6/5/1, 6/5/2, 8, 10 and 11 stand rejected under 35 U.S.C. §103(a) over Ramaswamy in view of Bandara et al. (U.S. 5,899,973, hereafter “Bandara”). Applicants respectfully traverse this ground of rejection. Ramaswamy in combination with Bandara fails to disclose or suggest base claims 1 or 8, as the combination fails to disclose or suggest the claimed invention, as, for example, Ramaswamy discloses that a reference language model is generated based on a small seed corpus containing linguistic units relevant to the domain (see for example, Abstract) and Bandara is discussing the contents of a language model with respect to an acoustic distance. Thus, the combination of references fails to disclose or suggest any of

Applicants' claims. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 3, 4, 5/3, 5/4, 6/5/3 and 6/5/4 stand rejected under 35 U.S.C. §103(a) over Ramaswamy in view of Bandara as applied to claims 1 and 2, and further in view of Klakow. Applicants respectfully traverse this ground of rejection.

First, it is respectfully submitted that the Supplemental Amendment that will be sent contains the certified English translation of the foreign priority document showing that the foreign priority of this application is earlier than Klakow.

In addition, it is respectfully submitted that the combination of Ramaswamy, Bandara and Klakow are not combinable, and assuming *arguendo*, would not disclose or suggest the claimed invention even if they were. For example, the combination shows that Ramaswamy discloses generating a language model based on a seed corpus relevant to a domain, whereas Klakow discloses selecting articles from a training corpus. Bandara allegedly discloses adapting a size of a language model to an acoustic distance. It is respectfully submitted that none of the instant claims would have been obvious to a person of ordinary skill in the art at the time of invention with knowledge of the combination of applied references.

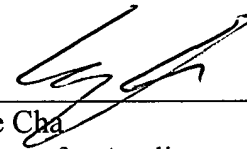
Reconsideration and withdrawal of this ground of rejection are respectfully requested. Applicants also respectfully submit that instant claim 12 is also believed to be allowable.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

Dan Piotrowski
Registration No. 42,079

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By: 
Steve Cha
Attorney for Applicant
Registration No. 44,069


Mail all correspondence to:

Dan Piotrowski, Registration No. 42,079
US PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
Phone: (914) 333-9624
Fax: (914) 332-0615

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Steve Cha, Reg. No. 44,069
(Name of Registered Rep.)


(Signature and Date)